

FREEDOM FROM RELIGION *foundation*

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March 27, 2018

SENT VIA EMAIL & U.S. MAIL:

ssnow@stockton.k12.mo.us

Dr. Shannon Snow, Superintendent
Stockton R-1 School District
PO Box 190
Stockton, MO 65785

Re: Unconstitutional School Assembly

Dear Dr. Snow:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation that occurred in the Stockton R-1 School District. FFRF is a national nonprofit organization with over 32,000 members across the country, including nearly 400 members in Missouri. FFRF's purposes are to protect the constitutional separation between state and church, and to educate the public on matters relating to nontheism.

We understand that the District recently invited Bob Holmes, the "one man volleyball team," to give presentations to middle and high school students. It is our understanding that Mr. Holmes was accompanied by representatives of the Agape Baptist Church who took pictures and video at both events. A post on the "Agape Baptist Church of Stockton Missouri" Facebook page from March 16, 2018 says: "the Lord allowed us [the Church] to get into Bolivar High School, Stockton High School, and Stockton Middle School through Bro. Holmes ministry to the public schools." This same post refers to him as "Evangelist Bob Holmes," "a friend of Agape for many years now." We understand that Mr. Holmes gave presentations both during school hours and in the evening at Stockton High School on February 22, 2018.

The evening event at Stockton High School was a full-scale Christian revival, once again in cooperation with Agape Baptist Church. We understand that a jazz ensemble of Stockton High School students played during the assembly, and that Mr. Holmes instructed these students to stay and listen to his sermon. Mr. Holmes' sermon recounted the crucifixion of Jesus in explicit, gruesome detail. He also aggressively proselytized the students, telling them that they "have a soul that's going to go on forever, and ever, and ever, either in heaven or hell. And I see you hanging over a lake of fire ready to fall in unless you find forgiveness." He closed by asking the audience to bow their heads in prayer and receive Jesus as their savior.¹ The Agape Baptist Church Facebook page declared: "The Lord used Bro. Holmes in a great way and as a result, 81 people left the evening rally having accepted Christ as Lord and savior."

¹ <https://www.facebook.com/agapebaptistchurchstocktonMO65785/videos/2049561352036459/>

The District failed to exercise due diligence.

We are aware that many Christian missionaries insinuate themselves into public schools by camouflaging their purpose. However, in the case of Bob Holmes, it would only require a cursory Google search to verify his proselytizing agenda. His own website refers to his work as a “ministry”² and his official Facebook page is replete with references to his evangelism.³ Please see the enclosed images.

Bob Holmes is not an entertainer, nor a motivational speaker: he is a missionary. In a news story from last year (a link to which is on Mr. Holmes’ Facebook page), he said:

“I’m so grateful for my church, Temple Baptist, because they’re sending me out across the country to try bring hope to young people, and Jesus Christ is the only answer—of course, I know I have to be careful what I say in a school.”⁴

Mr. Holmes openly proclaims his intent is to convert other peoples’ children to Christianity. In a sermon to his home church (posted on YouTube and publicly-viewable) he said:

“Why do I go to 5,000 schools? Because I just love volleyball—can’t wait to play again?[...] I don’t do it for volleyball, I do it because I’ve got an absolute truth [holds up a bible] and I can save somebody.”⁵

Mr. Holmes’ Facebook page contains a link to an interview he did with “Jesus Nation TV” (once again, posted on YouTube and publicly-viewable) in which the interviewer says: “We need Jesus. We need Jesus all across this world, but we need Jesus in our schools—and Bob Holmes is taking Jesus to our schools.”⁶ In a self-authored biography page on “youthpastor.com,” Mr. Holmes openly discusses his “evangelism” in public schools.⁷

In short, there is an astonishing amount of publicly-available information, much of which comes from Mr. Holmes himself, showing that he is an unapologetic missionary. Considering this glut of information, coupled with Mr. Holmes’ endorsement and accompaniment by members of Agape Baptist Church, we do not understand how this event could have been approved.

The District violated the Establishment Clause by inviting Bob Holmes and promoting his event at Stockton High School.

² <http://www.meetbob.info/missupport>

³ “Bob Holmes – One Man Volleyball Team.” <https://www.facebook.com/Bob-Holmes-One-Man-Volleyball-Team-965860556892627/> (including: references to Mr. Holmes leaving “tracts” of proselytizing literature at public schools; multiple testimonials from students who converted to Christianity; multiple references to Bob Holmes’ “ministry”; a post stating that “God is using this man to reach teens”; links to Mr. Holmes’ sermonss, etc.)

⁴ “One Man Volleyball Team is a man with a message.” WBIR, Knoxville, TN (June 28, 2017). <http://www.wbir.com/article/features/one-man-volleyball-team-is-a-man-with-a-message/51-452482189>

⁵ “The Bible is the Answer given by Bob Holmes.” Faith for the Family, posted October 24, 2016. <https://www.youtube.com/watch?v=G7paVI7ZNNI&t=865s> [see 14:00 and 26:00]

⁶ “Bob Holmes – One Many Volleyball Team (INTERVIEW). Gary Skeen, posted on July 1, 2017. <https://www.youtube.com/watch?v=gVFxmoiE09k&feature=youtu.be>

⁷ Bob “one man volleyball” Holmes Biography. Bob Holmes Youthpastor.com.

[http://www.youthpastor.com/pastor/index.cfm/Bob one man volleyball Holmes 8741.htm#WrE9JZPwbUb](http://www.youthpastor.com/pastor/index.cfm/Bob%20one%20man%20volleyball%20Holmes%208741.htm#WrE9JZPwbUb)

It is inappropriate to take away instructional time from students to expose them to a Christian missionary, regardless of any secular message the speaker claims to be promoting. It is well-settled that public schools may not advance or promote religion. See generally, *Lee v. Weisman*, 505 U.S. 577 (1992); *Wallace v. Jaffree*, 472 U.S. 38 (1985); *Epperson v. Ark.*, 393 U.S. 97 (1967); *Sch. Dist. of Abington Twp. v. Schempp*, 374 U.S. 203 (1963); *Engel v. Vitale*, 370 U.S. 421 (1962).

A child's religious or nonreligious upbringing is a personal matter between the child and their parents. See *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 310 (2000) ("the preservation and transmission of religious beliefs and worship is a responsibility and a choice committed to the private sphere." (quoting *Lee*, 505 U.S. at 589)). The Supreme Court has repeatedly held that public schools may not be co-opted, either by staff or outside adults, to proselytize students. See, e.g., *Edwards v. Aguillard*, 482 U.S. 578, 584 (1987) "[f]amilies entrust public schools with the education of their children, but condition their trust on the understanding that the classroom will not purposely be used to advance religious views that may conflict with the private beliefs of the student and his or her family."). See also *McCollum v Bd. of Ed.*, 333 U.S. 203, 210 (1948) (holding that the Constitution forbids the "utilization of the tax-established and tax-supported public school system to aid religious groups to spread their faith.").

Allowing a self-avowed evangelist and an accompanying cohort of church representatives even one-time access during school hours to preach and recruit students for religious events is a violation of the Establishment Clause. The courts have protected public school students from overreaching outsiders in similar situations. See, e.g., *Berger v. Rensselaer School District*, 982 F.2d 1160 (7th Cir. 1993) (holding that distribution of bibles by Gideons in school violated Establishment Clause). Accordingly, courts have granted injunctions against schools for their complacency in these matters. See, e.g., *Roark v. South Iron R-1 Sch. Dist.* 540 F. Supp.2d 1047, 1059 (E.D. Mo., 2008); upheld in relevant part by 573 F.3d 556, (8th Cir. 2009) (holding that school policy allowing evangelical Christian organization to distribute bibles in school violated Establishment Clause). The violation in this case is only further exacerbated by the District's promotion of the rally at Stockton High School.

Request for Public Records.

In order to better understand why the District invited an admitted evangelist to present in its schools, pursuant to the Missouri Sunshine Law, Chapter 610, Revised Statutes of Missouri, we request copies of the following records:

- 1.) Any contracts or agreements between Stockton R-1 School District and Bob Holmes or any representative of Bob Holmes;
- 2.) Any records (including emails, brochures, letters, etc.) received or sent by Stockton R-1 School District staff regarding Bob Holmes;
- 3.) Any financial records related to performances by Bob Holmes, including invoices, checks, and receipts;
- 4.) Any contracts or agreements between Stockton R-1 School District and Agape Baptist Church or any representative of Agape Baptist Church;
- 5.) Any school policies related to the promotion of religion in Stockton R-1 School District, including by outside visitors.

Conclusion.

We request that Stockton R-1 School District refrain from sponsoring inappropriate and unconstitutional assemblies moving forward, and that the District ensures that assemblies from outside groups or speakers do not contain an underlying proselytizing message or agenda. **We request specific assurances that Bob Holmes will not be invited to speak at any District schools in the future.**

If your office does not maintain the requested records, please direct me to the proper custodian. Any records available in electronic format may be emailed to colin@ffrf.org. Should you deny this request, please provide a written explanation, including references to any statutory exemptions upon which you rely. If I can provide any clarification that will expedite your attention to this request, please contact me at (608) 256-8900.

We request a reply in writing detailing the steps you are taking to remedy this violation.

Sincerely,



Colin E. McNamara, Esq.
Robert G. Ingersoll Legal Fellow
Freedom From Religion Foundation

Enclosures



Agape Baptist Church of Stockton Missouri added 87 new photos to the album: **Bob Homes: One Man Volleyball Team.**

March 16 at 10:34am · 🌐

We were privileged last month to have Evangelist Bob Holmes (The One Man Volleyball Team) here at Agape Baptist Church. Bro. Holmes has been a friend of Agape for many years now. The Lord allowed us to get into Bolivar High School, Stockton High School, and Stockton Middle School through Bro. Holmes ministry to the public schools. There were over 300 people that attended the Thursday evening rally. The Lord used Bro. Holmes in a great way and as a result, 81 people left the evening rally having accepted Christ as Lord and Savior. All glory and praise belongs to Him!!!



Bob Homes: One Man Volleyball Team

87 Photos



Like



Comment



Share



Agape Baptist Church of Stockton Missouri

February 16 · 🌐



Come out and join us for this special event at Stockton High School on Thursday, February 22nd, from 7pm to 9pm.

You won't want to miss it!!

For more information, feel free to contact Tim Martin at (417) 276-7215 ext. 220

The **ONE MAN VOLLEYBALL TEAM**

Introducing **BOB HOLMES**

FEATURED ON... **USA TODAY** **CNN** **CBS**

Rizz's **Believe It or Not!**
as the athlete who has played the most games in any sport in history!

WON OVER 18,500 GAMES LOST ONLY 450

LOCATION
Stockton High School

DATE **February 22nd, 2018** TIME **7:00 - 9:00**

BEAT THE ODDS WWW.BEATBOB.COM

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MINISTRY SUPPORT

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SUPPORT THE MINISTRY

m/> Hope you are able to support this outreach every month. Thank you so much for supporting this cause. By His Grace,
Bro. Bob Holmes

ENTER AMOUNT (EXAMPLE: 1.00)

School Assemblies



Select payments 12 payments

Add to Cart

Merchant Account

March 2018						>
M	T	W	T	F	S	S
			20			



Bob Holmes - One Man Volleyball Team



July 15, 2017 · 🌐

Dear Bob,

I was raped several times when I was six. My mom was a drug addict and my dad never wanted me. Mom was 16 when she got pregnant with me and she was going to get an abortion, but my grandmother wouldn't let her. So, she resorted to doing even more drugs during her pregnancy. As a result, I am blind in my left eye and have multiple heart problems.

I just want to say thank you for showing love and care for millions of people you don't even know! You brought a true answer JESUS CHRIST to the problem."

God sent you to remind all of us that GODS plan is bigger, I hope you can continue to visit more schools and preach the message even more

God Bless,
Samantha



Bob Holmes - One Man Volleyball Team



July 15, 2017 · 🌐

Dear Bob,

When you came to my school, RCB, I was about to end my life. I did not have anything left to do except take up space in everyone's daily lives. I felt useless. I was going to end my life on my birthday which is coming up on September 26. I had already prepared to hang myself with my own computer cord It was only a matter of time. On my birthday I asked Christ to save me instead of ending it all.

Your Newest Friend, David.





Bob Holmes - One Man Volleyball Team



July 15, 2017 · 🌐

I had a chance to bring up the Lord Jesus Christ, praise the Lord on the following Knoxville News station Channel 10

<http://www.wbir.com/.../one-man-volleyball-team-.../51-452482189>



www.wbir.com

WBIR.COM

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Bob Holmes - One Man Volleyball Team shared Desiree Antonelli's post.



March 13, 2017 · 🌐



Desiree Antonelli

March 13, 2017 · 🌐

Hear this amazing testimony of how God is using this man to reach teens - Bob Holmes. Listen live ...click

<http://radio.securenetsystems.net/v5/WASGFM>

WA...

[See More](#)



Beat Bob - The One Man Volleyball Team

Beat Bob - The One Man Volleyball Team

YOUTUBE.COM



Bob Holmes - One Man Volleyball Team



February 8, 2017 · 🌐

Here is a sermon by Bob Holmes that you will definitely want to check out.



God is Worth Waiting For given by Bob Holmes

Listen to this message given at Baptist Friends 2015 in...

YOUTUBE.COM





Bob Holmes - One Man Volleyball Team



July 15, 2017 · 🌐

Hi Bob,

You visited my school a month ago. I have struggled with cutting and suicidal thoughts a lot last year. But I have always doubted my salvation wondering how God could love me why he would want to love me. Today I found your tract on the floor in one of the classrooms I have experienced most of what was talked about in the tract. I read what you wrote about being born again, because of finding the tract I am now for sure saved.



2



Bob Holmes - One Man Volleyball Team is in United States.



July 2, 2017 · 🌐

<https://youtu.be/gVFxmoiE09k>



Bob Holmes - One Man Volleyball Team (INTERVIEW)

Bob Holmes - One Man Volleyball Team (INTERVIEW)

YOUTUBE.COM

